

REMARKS

Claims 1-6, 8-14, and 16-34 are pending.

Claims 1-6, 8-14, and 16-34 stand rejected.

Claims 1, 10, 16, 17, 29, and 32 have been amended.

Claim Objection

Claim 29 is objected to for a minor informality and has been amended to delete the second instance of the word “of.”

Accordingly, Applicants respectfully request withdrawal of the objection.

Claim Rejections - 35 U.S.C. § 112

Claims 10-14, 16, 31, and 32 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite.

Claim 10, 16, and 32 have been amended to clearly recite the modules as structural elements of the system.

Claim 31 relates to a contact database and data and does not recite a “module”. Accordingly, Applicants respectfully submit that claim 31 complies with 35 U.S.C. § 112.

Accordingly, Applicants respectfully request withdrawal of the rejection.

Claim Rejections - 35 U.S.C. § 103

Claims 1-6, 8-14, and 16-34 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 20020178161 to Brezin et al. (hereinafter “*Brezin*”) in view of U.S. Patent Publication No. 20020059201 to Work (hereinafter “*Work*”). Applicant respectfully traverses the rejection.

Brezin relates to:

A method and apparatus for optimizing information-retrieval related system performance based on users' communication relationships. Users' interactions and relationships with each other are tracked by a

'relationship analyzer' that queries multiple heterogeneous information sources, such as e-mail logs, organization charts, calendar entries, phone logs, etc. A data structure is created for each user reflecting the intensity of communication relationship with other users, and modified over time as the data in the information sources change. *Brezin*, Abstract.

The purpose of *Brezin* is "to improve system performance in a variety of ways: for example, to shorten retrieval time, to resolve missing or ambiguous results, to prioritize information for downloading to limited-resource computing devices, or to propagate updated information among closely related users." *Id.*

Work teaches allowing a user to search for a contact that conforms to a user's search query. More specifically, *Work* relates to:

Matches between search queries and potential targets of such search queries [that] are automatically brokered by (i) comparing search criteria specified in the search queries with profile criteria describing the potential targets, and (ii) reporting instances of acceptable correspondence between the search criteria and the profile criteria. *Work*, Abstract.

Applicants respectfully submit that *Brezin* in view of *Work* neither teaches nor suggests "analyzing the level of interaction between the members of the organization based on the network communications to develop a people network" and "determining a contact path between the first member of the organization and the target individual, the contact path including one or more members of the organization having at least a predetermined level of interaction with at least one of the first member and the target individual and the contact path identifies one or more members of the organization that represent a proposed path through the people network for the first member to contact the target individual."

Brezin focuses on "relationships", which, as supported in more detail below, are clearly distinct from a contact path. *Brezin* describes a "Relationship Analyzer (RA) and its interactions with Information Sources (IS) and a Relationship Database (RD)." *Brezin*, para. 0024. "The RD (108) stores one or more collections of "relationships."" *Id.*, para. 0025. Thus, *Brezin* assigns a value to a "relationship" between "x" and "y". Applicants respectfully submit that the "relationship" is not a contact path, rather "a relationship R(x,y) is a numeric value linking two users, "x" and "y" indicating the

"importance" of user "y" to user "x." *Id.* For an individual to obtain contact information of another individual, *Brezin* teaches the use of a query and filtering to obtain an e-mail address for another individual. For example:

FIGS. 5A-B depict an example of a query optimization, with prioritizing and filtering steps. As depicted, a user (101) "George Jones" of the marketing Division of XYZ Corp. sends a request (Q) (FIG. 5A, B 1064) to the RA (104) for a full e-mail address for "John Smith." The RA sends a query (1065) to the corporate NAB (115), which responds (FIG. 5A, B 107) with a list (1080) of people that satisfy the search criterion ("name=John Smith"). Once retrieved, the RA can use conventional sorting techniques to sort the list. According to the present invention, the list is sorted based on relationship values (1081, 1082) stored in the RD (108) and the optimized (sorted) response R_{opt} (FIG. 5A, B 116) is returned to the requester. In this example, the higher the relationship value between George Jones and an individual in the list (1080), the closer to the beginning of the list that person is displayed.

Thus, in the foregoing example, George Jones obtains contact information for John Smith only, and **does not** obtain a "contact path [that includes] one or more members of the organization having at least a predetermined level of interaction with at least one of the first member and the target individual and the contact path identifies one or more members of the organization that represent a proposed path through the people network for the first member to contact the target individual." Claims 1, 10, and 17.

Brezin also teaches calculating a "derived relationship" and a "derived-relation-group". More specifically, *Brezin* teaches that:

The RA preferably also calculates a "derived-relationship" $DR(x,y)$ for each person "x" and "y", where each "y" is a person in the relationship group $RG(z)$, such that

$$DR(x,y)=\text{sum}(z) (Rp(x,z)*Rp(z,y))$$

and a "derived-relation-group" $DRG(x)$ for each person "x" such that

$$DRG(x)=\text{all}(y), \text{ such that } DR(x,y) \geq \text{drg_cutoff}(x)$$

where "drg_cutoff(x)" is a constant numeric value unique to person "x." *Brezin*, paras. 0069-0073.

Although a relationship is derived between x and y by using a relationship between x and z and z and y, a contact path is not taught. *Brezin* still does not teach or suggest a “contact path identifies one or more members of the organization that represent a proposed path through the people network for the first member to contact the target individual” as required by claims 1, 10, and 17. Applicants’ conclusion is clearly illustrated in the example described by *Brezin* in para. 0074. *Brezin* teaches that:

Several well-known computer products generally called “Awareness Servers” (AS) are in common use today. Examples include AOL’s Instant Messenger and Ubique’s VP Buddy. Each user “x” of an AS lists a subset (the “buddy list,” or BL(x)) of the other users of the AS in which “x” is interested. Each AS provides an Awareness Client, AC, which the user runs on a client node and lists which of the other users in the BL(x) are currently “on-line.” The DRG(x) as described by the present invention provides an automatic way for defining a BL consisting of those users with a derived communication relationship, namely $BL(x)=DRG(x)$. *Brezin*, para. 0074.

Thus, the buddy list can include users in a derived communication list. However, the buddy list defines a direct communication path. For example, the buddy list lists which of the other users in the BL(x) are currently “on-line.” Notably, even though the buddy list includes users in a derived communication path, the buddy list includes direct contact with all the users in the buddy list and does not teach or suggest a “contact path [that] identifies one or more members of the organization that represent a proposed path through the people network for the first member to contact the target individual.” Claims 1, 10, and 17.

Thus, the claimed invention of the Present Application addresses the problem of, for example, allowing a “member [to] contact intervening members to help acquire assistance of an expert with whom the intervening member has direct or more direct contact, thus improving the likelihood that the expert will take a personal interest in addressing the task” (Present application, p. 7, lines 7-12) by “determining a contact path between the first member of the organization and the target individual, the contact path including one or more members of the organization having at least a predetermined level of interaction with at least one of the first member and the target individual and the contact path identifies one or more members of the organization that represent a proposed

path through the people network for the first member to contact the target individual.”

Claims 1, 10, and 17. (Note, the present invention is defined by the claims and not by specific embodiments described in the Present Application).

For at least the foregoing reasons, Applicants respectfully submit that *Brezin* in view of *Work* neither teaches nor suggests the present invention of claims 1, 10, and 17. For at least the same reasons, Applicants respectfully submit that *Brezin* in view of *Work* neither teaches nor suggests claims that directly or indirectly depend upon claims 1, 10, and 17.

CONCLUSION

In view of the amendments and remarks set forth herein, Applicant respectfully submits that all pending claims are in condition for allowance. Accordingly, Applicant requests that a Notice of Allowance be issued. Nonetheless, should any issues remain that might be subject to resolution through a telephone interview, the Examiner is requested to telephone the undersigned at 512-338-9100.

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Respectfully submitted,

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